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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

17 LOUIS A. COFFELT, JR.,  
18 Plaintiff,  
19 v.  
20  
21 AUTODESK, INC., a Delaware  
22 Corporation,  
Defendant.

Case No.: 5:17-cv-01684-FMO-SHK

**DEFENDANT AUTODESK, INC.'S  
REPLY IN SUPPORT OF  
MOTION TO DISMISS  
PLAINTIFF LOUIS A.  
COFFELT'S SECOND AMENDED  
COMPLAINT**

Date: February 22, 2018  
Time: 10:00 a.m.  
Courtroom: 6D, 6th Floor

Hon. Fernando M. Olguin

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1       **I. INTRODUCTION**

2           In its Opening Brief, Autodesk devoted *five full pages* to explaining how  
 3 Mr. Coffelt had failed to plausibly allege that either Autodesk or Sony Pictures  
 4 Imageworks (“Sony”) had access to his copyrighted works. (Dkt. No. 39 at 8-13.)  
 5 Autodesk devoted another *three full pages* to explaining how Mr. Coffelt is seeking  
 6 to protect uncopyrightable ideas. (*Id.* at 13-16.) Finally, Autodesk explained that,  
 7 absent a plausible allegation of access and direct infringement, none of  
 8 Mr. Coffelt’s indirect infringement allegations could survive. (*Id.* at 16-17.)

9           Rather than address these specific reasons for dismissal, Mr. Coffelt instead:  
 10 (1) reiterates the elements of his seven causes of action; (2) proposes to amend his  
 11 complaint yet again with “inadvertent[ly] omit[ted],” but irrelevant “missing facts”;  
 12 (3) accuses Autodesk of mischaracterizing his allegations and ignoring certain of  
 13 his copyrights; (4) contends that Autodesk’s discovery responses are “evasive,” but  
 14 show a “connection with OSL”; and (5) emphasizes that Autodesk has failed to  
 15 produce certain source code. None of these arguments overcomes the basic  
 16 problems with his Second Amended Complaint (“SAC”), *i.e.*, that Mr. Coffelt still  
 17 has not plausibly alleged access to his copyright works by *Autodesk or Sony*, and  
 18 that he is seeking to protect uncopyrightable ideas.

19           In dismissing his original complaint, the Court admonished Mr. Coffelt that  
 20 he should “carefully evaluate the contentions set forth in [Autodesk’s] [m]otion” in  
 21 preparing any amendments. (Dkt. No. 29 at 2.) The Court further instructed him to  
 22 specifically “allege facts regarding the copying of his copyrighted works” and to  
 23 address its “concern[]that the allegedly infringing work predates [Mr. Coffelt’s]  
 24 copyrighted work.” (*Id.*) Despite the opportunity to file two amended complaints,  
 25 Mr. Coffelt still has not cured the fundamental deficiencies in his complaint.  
 26 Because further amendments would be futile, Autodesk urges the Court to dismiss  
 27 Mr. Coffelt’s SAC without leave to amend.

1           **II. ARGUMENT**

2           **A. Mr. Coffelt's Continued Failure to Plausibly Allege Access Dooms**  
 3           **His Claims.**

4           **1. Mr. Coffelt's Claims All Require Showing Access.**

5           Mr. Coffelt does not appear to understand the critical role that establishing  
 6 access plays to his claims. To establish copyright infringement, Mr. Coffelt must  
 7 show: “(1) ownership of a valid copyright; and (2) *copying* of constituent elements  
 8 of the work that are original.” *See Feist Publ’ns, Inc. v. Rural Tel. Serv. Co., Inc.*,  
 9 499 U.S. 340, 361 (1991) (emphasis added). “Absent direct evidence of copying,  
 10 proof of infringement involves fact-based showings that *the defendant had ‘access’*  
 11 to the plaintiff’s work and that the two works are ‘substantially similar.’” *Three*  
 12 *Boys Music Corp. v. Bolton*, 212 F.3d 477, 481 (9th Cir. 2000) (emphasis added).

13           Mr. Coffelt’s characterization of his claims as based on the “*distribution*” of  
 14 a ‘*derivative work*’”<sup>1</sup> does not change these required showings. (Dkt. No. 42 at 6  
 15 (emphasis in original).) Infringement by a work that is based on a copyrighted  
 16 work still requires proof of substantially similarity *and* access, absent direct  
 17 copying. *See Morris v. Young*, 925 F. Supp. 1078, 1082 (C.D. Cal. 2013); *accord*  
 18 *Kulberg v. Pure Flix Entm’t LLC*, No. 16-cv-3949, 2016 U.S. Dist. LEXIS 170452,  
 19 at \*2-3 (C.D. Cal. Oct. 12, 2016).

20           Accordingly, unless Mr. Coffelt can allege facts “plausibl[y]” demonstrating  
 21 Autodesk’s or Sony’s access to his copyrighted works, dismissal is warranted under  
 22 Rule 12(b)(6) of the Federal Rules of Civil Procedure. *Bell Atlantic Corp. v.*  
 23 *Twombly*, 550 U.S. 544, 547 (2007); *accord Anderson News, LLC v. Am. Media*,

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24           <sup>1</sup> Mr. Coffelt’s characterization of the Open Shading Language (“OSL”) as an  
 25 allegedly infringing “derivative work” is confusing. That phrase typically refers to  
 26 a work that has been “substantially copied” from a prior copyrighted work *with* the  
 27 consent of the copyright owner.” 1 Nimmer on Copyright § 3.01 (2017) (emphasis  
 28 added); *see* 17 U.S.C. §§ 101, 106. For purposes of Mr. Coffelt’s SAC, Autodesk  
 assumes that Mr. Coffelt’s use of “derivative work” refers to something that has  
 been substantially copied from a copyrighted work, but *without* the copyright  
 owner’s consent.

1 *Inc.*, 680 F.3d 162, 182 (2d Cir. 2012) (explaining that, “[t]o present a plausible  
2 claim,” a pleading must “allege facts that would be sufficient to permit a reasonable  
3 inference that the defendant has engaged in culpable conduct”) (cited at Dkt. No. 42  
4 at 4) (citations omitted).

## **2. Mr. Coffelt Has Not Plausibly Alleged Access by Autodesk.**

In his opposition, Mr. Coffelt essentially concedes that he still has not yet identified facts plausibly supporting this allegation that Autodesk accessed his copyrighted works. (Dkt. No. 42.) For example, while Mr. Coffelt outlines the elements for each of his seven causes of action (*Id.* at 3-6), he makes no attempt to explain how this demonstrates Autodesk’s access.

11 Instead, Mr. Coffelt claims that he “inadvertent[ly] omit[ted] facts relating to  
12 ‘access’ to [his] [c]opyrighted [w]orks.” (*Id.* at 8.) Mr. Coffelt then references two  
13 paragraphs of his attached declaration. (*Id.* (referring to Dkt. No. 43 at ¶¶ 7, 8).)

14 The two referenced paragraphs from his declaration, however, underscore  
15 Mr. Coffelt’s lack of plausible evidence and the futility of further amendments.  
16 The paragraphs ***do not relate to alleged actions by Autodesk at all***, but only by  
17 California Department of Corrections (“CDC”) agents<sup>2</sup> in 2011 and 2013.  
18 According to Mr. Coffelt, a CDC agent inserted a flash drive into his computer with  
19 his copyrighted works in 2011. The same or a different CDC agent allegedly  
20 connected a modem to his computer in 2013. (Dkt. No. 43 at ¶¶ 7, 8.)

21 These alleged accesses by CDC agents come nowhere close to explaining  
22 how *Autodesk* allegedly accessed Mr. Coffelt's copyrighted works. Mr. Coffelt  
23 still does not explain why it is plausible that Autodesk accessed his copyrighted

<sup>2</sup> The CDC agents presumably accessed Mr. Coffelt's computer as a special condition of his parole for violating California Penal Code § 288(a). In addition to mandatory registration under Penal Code § 290, Mr. Coffelt "agree[d] and voluntar[il]y consent[ed] to announced or unannounced examination and/or search of his electronic devices." *See Coffelt v. T. Baker*, Case No. 13-cv-568-RGK-AS, Complaint, Dkt. No. 3, at 18-26 (C.D. Cal. Apr. 3, 2013) (listing special conditions).

1 works via its “significant relationship with the CDC.” (Dkt. No. 35 at 106.) *See*  
 2 *Art Attacks Ink, LLC v. MGA Entm’t Inc.*, 581 F.3d 1138, 1143 (9th Cir. 2009) (“To  
 3 prove access, a plaintiff must show a reasonable possibility, not merely a bare  
 4 possibility, that an alleged infringer had the chance to view the protected work.”).  
 5 For example, Mr. Coffelt points to no “overlap in subject matter” between  
 6 Autodesk and the CDC that somehow might “permit an inference of access.” *Meta-*  
 7 *Film Assocs., Inc. v. MCA, Inc.*, 586 F. Supp. 1346, 1358 (C.D. Cal. 1984).

8 Nor does Mr. Coffelt explain why it is plausible (or even possible) that the  
 9 CDC agents ever “caused [his] copyrighted works to be copied and distributed  
 10 world wide [sic] without [his] authorization.” (*Id.* at ¶ 35.) *See Rice v. Fox Broad.*  
 11 Co., 330 F.3d 1170, 1178 (9th Cir. 2003) (requiring evidence of commercial  
 12 success or distribution through relevant media channels to show widespread  
 13 dissemination).<sup>3</sup>

### 14           **3.       Mr. Coffelt Also Has Not Plausibly Alleged Access by Sony.**

15 Mr. Coffelt also does not allege facts plausibly demonstrating that Sony (or  
 16 Larry Gritz, a creator of the OSL) ever accessed his copyrighted works. In fact,  
 17 Mr. Coffelt does not address the issue of Sony’s access in his opposition at all.

18 Mr. Coffelt only disputes whether there is any “evidence in the record in this  
 19 case that OSL predates [his] copyrighted works.” (Dkt. No. 42 at 1, 7.) This  
 20 ignores Autodesk’s request for judicial notice that Sony released OSL on January  
 21 14, 2010—before Mr. Coffelt published any of his copyrighted works. (Dkt. No.  
 22 (Request for Judicial Notice); Dkt. No. 22-1 (Sony press release).) As “a prior-  
 23 created work cannot infringe a later-created one,” and Mr. Coffelt has not alleged  
 24 that his copyrighted works predate OSL, OSL cannot infringe his copyrighted

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 26  
 27           <sup>3</sup> Mr. Coffelt apparently has abandoned his alternative theory that Autodesk  
 28 accessed his copyrighted works by reviewing his patent. (Dkt. No. 35 ¶ 105.) In  
 his opposition, Mr. Coffelt does not discuss this theory or respond to its  
 deficiencies. (Dkt. No. 42.)

1 works as a matter of law. *Christian v. Mattel, Inc.*, 286 F.3d 1118, 1128 (9th Cir.  
 2 2002).

3           **B. Mr. Coffelt Does Not Dispute that His Copyright Infringement  
 4 Claims Are Based on Unprotectable Ideas.**

5           Mr. Coffelt’s characterization of his claims as directed to infringing  
 6 “derivative works” (*i.e.*, works that are substantially copied from a copyrighted  
 7 work) also does not change the fact that ideas themselves are uncopyrightable. *See*  
 8 17 U.S.C. § 102; *see also Mazer v. Stein*, 347 U.S. 201, 217 (1954) (“Unlike a  
 9 patent, a copyright gives no exclusive right to the art disclosed; protection is given  
 10 only to the expression of the idea — not the idea itself.”); *Sega Enters. Ltd. v.*  
 11 *Accolade, Inc.*, 977 F.2d 1510, 1524 (9th Cir. 1992). Yet that is precisely what  
 12 Mr. Coffelt is trying to protect in his SAC.

13           As Autodesk explained in its Opening Brief, Mr. Coffelt’s SAC repeatedly  
 14 alleges that OSL infringes because it “creates results identical to Coffelt’s CAD  
 15 Work results” and uses the same concepts, such as “the direction of view” and a  
 16 “reflection vector.” (Dkt. No. 39 (citing Dkt. No. 35 at ¶¶ 78, 104, Ex. 121).) Mr.  
 17 Coffelt confirms as much in his opposition, alleging that “the basis for OSL is  
 18 identical to Coffelt’s basis for the copyrighted work” and “that OSL results are  
 19 identical to Coffelt’s copyrighted work results.” (Dkt. No. 42 at 9.) But Mr.  
 20 Coffelt cannot state a claim for copyright infringement based on Autodesk’s (or  
 21 Sony’s) alleged copying of his ideas. *See Mazer*, 347 U.S. at 217.

22           Nor does Mr. Coffelt’s reference to the “abstraction-filtration-comparison”  
 23 test lend him any aid. (Dkt. No. 42 at 4 (citing *Sega and Mitel, Inc. v. Iqtel, Inc.*,  
 24 124 F.3d 1366, 1372 (10th Cir. 1997)).) In fact, his cited cases underscore that  
 25 copyright law protects only the *expression* of ideas, and not the ideas themselves.  
 26 *See Sega*, 977 F.2d at 1524 (“The protection established by the Copyright Act for  
 27 original works of authorship does not extend to the ideas underlying a work or to  
 28 the functional or factual aspects of the work.”); *Mitel*, 124 F.3d at 1372

1 (“[A]lthough an element of a work may be characterized as a method of operation,  
 2 that element may nevertheless contain expression that is eligible for copyright  
 3 protection.”).

4        Regardless, Mr. Coffelt offers no response to Autodesk’s detailed  
 5 explanation as to why Exhibit 121—Mr. Coffelt’s lone evidence of infringement—  
 6 relates to uncopyrightable ideas. (Dkt. No. 39 at 15-16.) Because Mr. Coffelt does  
 7 not dispute that he is seeking to protect uncopyrightable ideas, he has failed to state  
 8 a claim for copyright infringement.

### 9            **C.     Mr. Coffelt’s Other Arguments Do Not Weigh Against Dismissal**

10          In his opposition, Mr. Coffelt raises a wide variety of additional arguments  
 11 for why dismissal would be inappropriate. To the extent that these arguments can  
 12 be understood,<sup>4</sup> none weighs against dismissal.

13          For example, Mr. Coffelt complains that Autodesk did not address his  
 14 infringement allegations for each and every one of his copyrighted works, but only  
 15 Copyright No. TX-8-447-381. (Dkt. No. 42 at 7.) Mr. Coffelt ignores that he only  
 16 attempted to provide an explanation for that copyrighted work (Dkt. No. 35 at Ex.  
 17 121), but merely listed the copyright numbers for his other works (*id.* at ¶¶ 115-  
 18 180). As Autodesk explained in its Opening Brief, Mr. Coffelt’s mere listing of  
 19 those copyright numbers does not state a claim. (Dkt. No. 39 at 16 n.4.)

20          Mr. Coffelt also apparently suggests that his sixth and seventh causes of  
 21 action, which relate to indirect infringement, should survive dismissal because they  
 22 are “inherently” based on “facts directed to OSL.” (Dkt. No. 42 at 7.) Mr. Coffelt  
 23 overlooks that he cannot state a claim merely by stating conclusory allegations from  
 24 which the supporting facts must be divined. *See Ashcroft v. Iqbal*, 556 U.S. 662,  
 25 678 (2009) (explaining that successfully stating a claim “demands more than an  
 26 unadorned, the-defendant-unlawfully-harmed-me accusation”). Mr. Coffelt further  
 27

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28          <sup>4</sup> Because Mr. Coffelt’s positions continue to be difficult to understand, Autodesk  
 presents its responses based on its best understanding of those positions.

1 continues to ignore that, absent proof of direct infringement, Autodesk cannot be  
2 liable for contributory infringement or vicarious liability. *See Metro-Goldwyn-*  
3 *Mayer Studios Inc. v. Grokster, Ltd.*, 545 U.S. 913, 930 (2005).

4 Finally, Mr. Coffelt contends that (i) Autodesk’s “evasive” discovery  
5 responses, (ii) its admission that its products have “a connection with OSL,” and  
6 (iii) its failure to explain an affirmative defense or provide source code somehow  
7 demonstrate that his claims are plausible. (Dkt. No. 42 at 9.) Yet besides making  
8 these contentions, Mr. Coffelt does not explain them at all.

9 Regardless, each of Mr. Coffelt’s contentions is false. First, as Autodesk  
10 explained in opposing Mr. Coffelt’s latest motion to compel, his discovery requests  
11 failed to follow the requirements of basic civil procedure and were nonsensical.  
12 (Dkt. No. 40.) Among other things, Mr. Coffelt’s requests combined document  
13 requests and interrogatories, exceeded the default limit on interrogatories under  
14 Rule 33, and sought information relating to companies (*e.g.*, Pixar) that are not even  
15 parties to this case. It was for these reasons that Autodesk did not offer substantive  
16 responses to the great majority of them and, indeed, successfully moved to stay all  
17 discovery pending Mr. Coffelt’s service of a complaint that satisfies Rule 12(b)(6).  
18 (Dkt. Nos. 46, 47 (orders staying discovery and Mr. Coffelt’s second motion to  
19 compel).)

20 Second, Autodesk’s support for OSL in certain of its products does not  
21 demonstrate that its products infringe. Among other things, Mr. Coffelt still has not  
22 alleged facts showing that Sony (which developed OSL) accessed his copyrighted  
23 works or actually copied their expression of ideas.

24 Third, Autodesk’s failure to identify its affirmative defenses or produce  
25 source code to Mr. Coffelt does not prove that his claims are plausible. The reason  
26 that Autodesk has not yet presented its affirmative defenses, of course, is that  
27 Mr. Coffelt still has not stated a claim under Rule 12(b)(6). Moreover, no source  
28 code has been produced because no protective order has been entered (despite

1 Autodesk's attempts to advance this process by sending Mr. Coffelt an initial draft)  
2 and discovery has been stayed.

3           **D. Mr. Coffelt Alleges No Facts in His Opposition Warranting  
4 Further Leave to Amend**

5           In its Opening Brief, Autodesk explained that the SAC actually is  
6 Mr. Coffelt's fourth attempt to state a claim. (Dkt. No. 39 at 17.) Judge Otero  
7 dismissed Mr. Coffelt's patent infringement lawsuit in 2016 for failure to state a  
8 claim, and Mr. Coffelt now has served three different complaints in these  
9 proceedings.

10          For all of the reasons that Autodesk identified in its Opening Brief and  
11 above, Mr. Coffelt's latest amended complaint does not cure the deficiencies in his  
12 prior complaints. In his opposition, Mr. Coffelt does not attempt to explain how  
13 further amendments might address these deficiencies.

14          The only amendment that Mr. Coffelt proposes relates to "inadvertent[ly]  
15 omit[ted] facts directed to 'access' to [his] copyrighted work[s].” (Dkt. No. 42. at  
16 2.) Mr. Coffelt identifies these "supplemental facts" in paragraphs 7 and 8 of his  
17 declaration. (*Id.* at 8 (referring to Dkt No. 43).)

18          As explained above, however, these "facts" relate to alleged access by CDC  
19 agents—not Autodesk. Accordingly, further amendment would not remedy the  
20 issues with Mr. Coffelt's SAC and would be futile. *See Butler v. Robar Enters.*,  
21 208 F.R.D. 621, 623 (C.D. Cal. 2002) ("A proposed amendment is futile if no set of  
22 facts can be proved under the amendment that would constitute a valid claim or  
23 defense.").

24           **III. CONCLUSION**

25          Mr. Coffelt still identifies and alleges no facts that plausibly demonstrate  
26 Autodesk or Sony's access to his copyrighted works. He also does not challenge  
27 that his infringement claims relate to uncopyrightable ideas. Because Mr. Coffelt  
28 has already filed three complaints in these proceedings and has identified no facts

1 or allegations that warrant further amendments, the Court should dismiss  
2 Mr. Coffelt's Second Amended Complaint without leave to amend.

3 Dated: February 8, 2018 By: /s/ Richard S.J. Hung

4  
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